

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:15-cr-403-2 HEA (SPM)
)
CHARLES FLOWERS,)
)
 Defendant.)

FIRST MOTION TO CONTINUE CHANGE OF PLEA HEARING

COMES NOW Defendant, Charles Flowers, by and through counsel, and hereby moves this Court to continue the change of plea hearing presently scheduled for March 8, 2016 to March 17, 2016. In support of this motion, Defendant states as follows.

1. Defendant fell ill this past weekend and, as a result, has asked to continue tomorrow's change of plea hearing to a date during the week of March 14th.
2. For this reason, Defendant files the instant motion.
3. For this same reason, the instant motion is necessary to provide counsel for the "defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence." 18 U.S.C. § 3161(h)(7)(B)(iv). Accordingly, "the ends of justice served by [granting this motion] outweigh the best interest of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7)(A).
4. Defendant, through counsel, has discussed this matter with assistant United States attorney Sirena Wissler. Ms. Wissler does not object to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the

change of plea hearing presently scheduled for March 8, 2016 to March 17, 2016.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein
ADAM D FEIN, #52255 MO
Attorney for Defendant
120 S. Central Avenue, Suite 130
Clayton, Missouri 63105
(314) 862-4332/Facsimile (314)862-8050

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Sirena Wissler, assistant United States attorney.